

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WI-LAN INC.,

Plaintiff,

V.

## **LG ELECTRONICS, INC. and LG ELECTRONICS U.S.A., INC.,**

## Defendants.

10 Civ. 432 (LAK) (AJP)

**AFFIRMATION OF RICHARD D.  
HARRIS IN SUPPORT OF  
DEFENDANTS' CONSOLIDATED  
MOTION FOR SUMMARY  
JUDGMENT, DEFENDANTS'  
STATEMENT OF UNDISPUTED  
MATERIAL FACTS PURSUANT  
TO LOCAL RULE 56.1, AND  
DEFENDANTS' OPENING CLAIM  
CONSTRUCTION BRIEF**

I, Richard D. Harris,, affirm as follows:

1. I am an attorney at Greenberg Traurig, LLP, attorneys for Defendants and Counterclaim-Plaintiffs LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively “LG” or “Defendants”) in the above-captioned matter. I have personal knowledge of the facts discussed herein and, if called to testify, I would and could competently testify to those facts. I respectfully submit this Affirmation in support of Defendants’ consolidated motion for summary judgment, Defendants’ statement of undisputed material facts pursuant to Local Rule 56.1, and Defendants’ opening claim construction brief. Attached hereto as the exhibit number identified is a true and correct copy of the document described:

**EX #**

## DOCUMENT

1. U.S. Patent No. 5,828,402 to Collings. (WL0003028)
  2. CA Patent No. 2,179,474 to Collings.

3. Prosecution History of U.S. Ser. No. 08/667,030. (LG081938)
4. U.S. Patent No. 4,554,584 to Elam. (WL0004325)
5. U.S. Patent No. 5,387,942 to Lemelson. (WL0004309)
6. Vogel, U.S. Patent No. 4,930,160. (WL0027804)
7. Tim Collings, *Violence and Television: The Canadian Example*, International Symposium, Canadian Studies Centre, Sorbonne Nouvelle University, Paris of 6/16/94-6/18/94. (LG041581)
8. Letter from T. Collings to J. Curry of 4/20/94. (WL0055858) [FILED UNDER SEAL].
9. Decl. of Jeffrey S. Hamilton of 1/14/11.
10. Digicipher® II, System Information Description, 4/28/95. (WL0014921)
11. DAVIC Statutes of 3/23/11.
12. GI System Information Description of 5/17/95. (LG042245)
13. '402 Patent Reexamination Decl. of C. Tanner of 10/7/10.
14. ATSC Standard: PSIP for Terrestrial Broadcast and Cable (Revision B). (ATSC146123)
15. Letter from C. Tanner to M. Richmond of 1/10/98. (ATSC036439)
16. Decl. of B. Lechner of 1/14/11.
17. Draft Meeting Minutes of the ATSC of 5/24/95. (ATSC004050)
18. P. Hearty Report on Disclosure/Publication of GI SI Protocol of 11/6/06. (WL0430354) [FILED UNDER SEAL].
19. Melbourne GI System Information Description of 5/17/95. (ATSC058917)
20. System Information for Digital Television, A/56, 1/3/96. (WL0044115)
21. '402 Patent Reexamination Request of 12/24/09. (LG091441)
22. '402 Patent Reexamination Grant of 3/2/10. (LG091393)
23. '402 Patent Reexamination Office Action of 7/29/10. (LG091374)

24. Wi-LAN's 3rd Supp. Resp. to LG Rog. Nos. 1-8 of 9/20/10. [FILED UNDER SEAL].
25. Minutes of Advanced Television Systems Committee, Inc. Board of Directors Meeting and ATSC Membership Report of 9/9/03. (ATSC183798)
26. Letter and Patent Search from R. Simmer to T. Collings of 2/11/93. (WL0055853) [FILED UNDER SEAL].
27. Letter and Patent Search From R. Simmer to D. Gelbart of 4/22/94. (WL0171462) [FILED UNDER SEAL].
28. Email Chain between D. Gelbart and J. Curry of 4/22/94. (WL0055860) [FILED UNDER SEAL].
29. Wi-LAN Document re: Sony Discussion and US Patent 5,828,402. (WL0328508) [FILED UNDER SEAL].
30. T. Collings Comments to FCC of 3/19/97. (LG112581)
31. T. Collings Comments to FCC of 10/1/1997. (LG112385)
32. T. Collings Comments to FCC of 4/4/03. (WL0147474).
33. Ex Parte Letter From T. Collings to FCC of 10/24/03. (WL0279113)
34. Email from D. Moulton to T. Collings of 1/6/03. (WL0376481 ) [FILED UNDER SEAL].
35. FCC 04-192 Report and Order of 9/7/04. (WL0107962)
36. Tri-Vision Press Release of 9/8/04. (WL0271284)
37. CEA Petition for Clarification and/or Reconsideration to FCC of 11/3/2004. (WL0307036)
38. Wi-LAN Document re: FCC Meeting Minutes. (WL0306780) [FILED UNDER SEAL].
39. CEA Reply Comments to FCC of 11/15/04. (WL0001084)
40. T. Collings and Tri-Vision Opposition to Petition for Clarification and/or Reconsideration by the CEA to FCC of 11/22/04. (WL0113492)
41. Letter from N. Siddiqui to J. Yanfeng & Z. Yili of 5/30/07. (WL0110679) [FILED UNDER SEAL].

42. Letter from N. Siddiqui and B. Middleton to J. Ho of 7/16/07. (WL0011744) [FILED UNDER SEAL].
43. Letter from N. Siddiqui and B. Middleton to Y. Lee of 3/28/08. (WL0046834) [FILED UNDER SEAL].
44. Coalition Comments and Opposition to the CEA Petition to FCC of 1/21/05. (LG121380)
45. Letter from R. Parr to P. Paoletta of 12/3/04. (WL0113470) [FILED UNDER SEAL].
46. Letter from R. Parr to N. Siddiqui of 1/7/05. (WL0306692) [FILED UNDER SEAL].
47. Letter from R. Parr to P. Paoletta and D. Ladson of 1/19/05. (WL0113428) [FILED UNDER SEAL].
48. Email from J. Kearney to TVMC TV Mfrs. Caucus of 1/24/05. (CEA105140) [FILED UNDER SEAL].
49. CEA Reply to Opposition to FCC of 1/31/05. (WL0099632)
50. Email from T. Collings to N. Siddiqui of 8/9/03. (WL0376367) [FILED UNDER SEAL].
51. Advanced Television Systems Committee Patent Policy of 1/31/02. (ATSC186020)
52. Email from T. Collings to C. Moffat, N. Siddiqui of 11/12/04. (WL0306885) [FILED UNDER SEAL].
53. Letter from N. Siddiqui to Mr. Cho of 10/25/04. (WL0109583) [FILED UNDER SEAL].
54. Letter from N. Siddiqui to S.Y. Kang of 11/3/04. (WL0111236) [FILED UNDER SEAL].
55. Letter from N. Siddiqui to M. Richer of 12/8/04. (ATSC185133).
56. Letter from N. Siddiqui to M. Richer of 5/11/05. (WL0005292) [FILED UNDER SEAL].
57. Coalition for Independent Ratings, Articles of Incorporation, 11/20/07. (LG124252)
58. Email from N. Siddiqui to M. Eldon, of 5/28/08. (WL0407490) [FILED UNDER SEAL].

59. Email from N. Siddiqui to D. Nuhn, D. Macrae & W. Middleton, of 10/25/09. (WL0429739) [FILED UNDER SEAL].
60. Michael P. Fortkort PC, Transaction List by Vendor, 10/9/10. (FORTKORT-0000334) [FILED UNDER SEAL].
61. Invoice from D. Perri to M. Fortkort of 8/1/07. (DP 01486) [FILED UNDER SEAL].
62. Invoice from D. Perri to M. Fortkort of 3/3/07. (DP 01487) [FILED UNDER SEAL].
63. Invoice from D. Perri to M. Fortkort of 12/17/07. (DP 01488) [FILED UNDER SEAL].
64. Invoice from D. Perri to M. Fortkort of 8/21/07. (DP 01489) [FILED UNDER SEAL].
65. Invoice from D. Perri to M. Fortkort of Apr. 27, 2007. (DP 01494) [FILED UNDER SEAL].
66. Email from M. Eldon to D. Perri, N. Siddiqui, T. Collings, L. Wan & J. Roberts of 3/4/10. (WL0297321) [FILED UNDER SEAL].
67. Email from M. Eldon to D. Perri of 4/21/10. (WL0298588) [FILED UNDER SEAL].
68. Email from D. Perri to N. Siddiqui of 12/1/09. (DP02997) [FILED UNDER SEAL].
69. Email from M. Eldon to W. Middleton, J. Skippen, N. Siddiqui, & T. Collings of 11/7/08. (DP 05385) [FILED UNDER SEAL].
70. Email from T. Collings to M. Eldon of 10/26/06. (WL0345932) [FILED UNDER SEAL].
71. Email from M. Eldon to N. Siddiqui & M. Fortkort of 12/12/06. (WL0345730) [FILED UNDER SEAL].
72. Email from T. Collings to M. Eldon of 12/15/06. (WL0325825) [FILED UNDER SEAL].
73. Email from T. Collings to M. Eldon of 3/1/07. (WL0342771) [FILED UNDER SEAL].
74. Email from D. Perri to M. Eldon of 6/1/01. (DP05631) [FILED UNDER SEAL].

75. Invoice from D. Perri to M. Fortkort of 11/27/06. (FORTKORT-0000314) [FILED UNDER SEAL].
76. Letter from P. Paoletta to M. Dortch of 8/7/07. (LG048954)
77. Email from D. Perri to M. Eldon of 12/11/06. (WL0195026) [FILED UNDER SEAL].
78. Email from M. Eldon to T. Collings of 12/19/06. (WL0325870) [FILED UNDER SEAL].
79. Email from M. Eldon to T. Collings of 12/19/06. (WL0325875) [FILED UNDER SEAL].
80. Email from N. Siddiqui to D. Perri of Dec. 21, 2006. (WL0196506) [FILED UNDER SEAL].
81. Email from D. Perri to A. Long & E. Gore of 12/21/06. (WL0194966) [FILED UNDER SEAL].
82. Letter from P. Jenkins to D. Perri of 2/15/10. (WL0279519) [FILED UNDER SEAL].
83. Invoice from D. Perri to M. Fortkort of 4/6/10. (DP 01570) [FILED UNDER SEAL].
84. Letter from N. Siddiqui to the Federal Communications Commission of 3/26/10. (LG112072)
85. Letter from D. Perri to the Federal Communications Commission of 2/24/10. (WL0297192)
86. Letter from T. Collings to D. Perri, N. Siddiqui, & M. Eldon of 4/2/08. (WL0147689) [FILED UNDER SEAL].
87. Email from T. Collings to D. Perri, N. Siddiqui, M. Eldon & L. Wan of 4/1/09. (WL0268981) [FILED UNDER SEAL].
88. Draft of “Comments of DTV Innovations” to Federal Communications Commission. (WL0268729) [FILED UNDER SEAL].
89. Email from D. Perri to M. Eldon & T. Collings of 12/12/08. (WL0286403) [FILED UNDER SEAL].
90. Email from M. Eldon to N. Siddiqui of 10/19/09. (WL0381700) [FILED UNDER SEAL].
91. Email from T. Collings to M. Eldon of 8/22/07. (WL0342483) [FILED UNDER SEAL].

92. Email from N. Siddiqui to T. Collings, M. Eldon & L. Wan of 10/17/07. (WL0344483) [FILED UNDER SEAL].
93. Email from T. Collings to D. Perri & M. Eldon of 12/3/07. (WL0148108) [FILED UNDER SEAL].
94. Email from M. Eldon to N. Siddiqui & T. Collings of 11/27/07. (WL0423855) [FILED UNDER SEAL].
95. Attachment to email from M. Eldon to N. Siddiqui & T. Collings of 11/27/07. (WL0423856) [FILED UNDER SEAL].
96. Email from T. Collings to D. Perri of 2/1/08. (WL0129379) [FILED UNDER SEAL].
97. Email from M. Eldon to D. Perri of 11/16/07. (DP 05391) [FILED UNDER SEAL].
98. Email from N. Siddiqui to A. Kang of 4/23/07. (LG075642) [FILED UNDER SEAL].
99. Email from T. Collings to M. Eldon of 11/8/07. (WL0325330) [FILED UNDER SEAL].
100. Lobbying Registration P. Paoletta, filed 6/2/04. (LG124182)
101. Lobbying Registration P. Paoletta, filed 8/4/04. (LG124184)
102. Lobbying Registration P. Paoletta, filed 2/10/05. (LG124187)
103. Lobbying Registration P. Paoletta, filed 8/10/05. (LG124189)
104. Lobbying Registration P. Paoletta, filed 8/11/09. (LG124191)
105. Lobbying Registration P. Paoletta, filed 2/9/06. (LG124193)
106. Lobbying Registration P. Paoletta, filed 6/5/07. (LG124195)
107. Lobbying Registration P. Paoletta, filed 8/13/07. (LG124197)
108. Lobbying Registration P. Paoletta, filed 2/14/08. (LG124199)
109. Lobbying Registration P. Paoletta, filed 4/21/08. (LG124201)
110. Lobbying Registration P. Paoletta, filed 7/21/08. (LG124203)
111. Lobbying Registration P. Paoletta, filed 10/20/08. (LG124205)

112. Email from T. Collings to T. Meagher, M. Eldon & N. Siddiqui of 10/31/06. (WL0328443) [FILED UNDER SEAL].
113. Hearty Consulting Agreement. (WL0359196) [FILED UNDER SEAL].
114. Help Wanted Article and Draft Tanner letter. (ATSC036387) [FILED UNDER SEAL].
115. Email from M. Eldon to D. Perri of 1/30/2007. (WL0153930) [FILED UNDER SEAL].
116. Wi-LAN's First Set of Interrogatories. [FILED UNDER SEAL].
117. Excerpts of McGraw-Hill Electronics Dictionary.
118. Excerpts of C. Tanner Opening Ex. Rpt. of 1/14/11. [FILED UNDER SEAL].
119. D. Wallace Opening Ex. Rpt. of 1/14/11. [FILED UNDER SEAL].
120. Excerpts of T. Collings 30(b)(6) Deps. [FILED UNDER SEAL].
121. Excerpts of T. Collings Indiv. Deps. [FILED UNDER SEAL].
122. *Desenberg v. Google, Inc.*, Case No. 08 Civ 10121 (GBD) (AJP), 2009 U.S. Dist. Lexis 6612  
Excerpts of D. Perri Dep., dated 3/15/11 [FILED UNDER SEAL].
124. Excerpts of N. Siddiqui Dep., dated 12/3/10 [FILED UNDER SEAL].
125. Excerpts of M. Dolan Dep., dated 2/25/11 [FILED UNDER SEAL].
126. Excerpts of C. Tanner Dep., dated 2/28/11 [FILED UNDER SEAL].
127. Excerpts of D. Wallace Dep., dated 2/18/11 [FILED UNDER SEAL].
128. 10/24/03 Ex Parte Letter from T. Collings to FCC. (WL0279085)
129. Decl. Of Adam Goldberg In Support Of Defendants' Motion For Summary Judgment Of Non-Infringement.
130. Decl. Of Adam Goldberg In Support Of Defendants' Motion For Summary Judgment Of Invalidity.
131. Excerpts of C. Tanner Rebuttal Ex. Rpt. of 1/28/11.
132. Excerpts of Microsoft Computer Dictionary.

133. Excerpts of S. Shin Dep., dated 10/6/10 [FILED UNDER SEAL].
134. ‘402 Patent Reexamination Office Action Response of 10/29/10. (WL0304995)
135. Wi-LAN’s Resp. to LG’s Third Set of Interrogatories. [FILED UNDER SEAL]
136. Memo from D. Perri to T. Collings & M. Eldon of 2/28/2007. (WL0153704) [FILED UNDER SEAL].
137. Tri-Vision IP Proffers to CEA, 6/4/2003. (WL0001089)
138. Email from D. Perri to M. Eldon of 10/14/09. (WL0292458) [FILED UNDER SEAL].
139. Email from M. Eldon to T. Collings of 1/29/07. (WL0185910) [FILED UNDER SEAL].
140. Email from M. Eldon to T. Collings of 2/2/07. (WL0145119) [FILED UNDER SEAL].
141. Email from D. Perri to M. Eldon of 2/2/07. (WL0153906) [FILED UNDER SEAL].
142. Minutes of Consumer Electronics Association, 2/16/07. (DP 01405) [FILED UNDER SEAL].
143. Email from D. Perri to M. Eldon & T. Collings, 2/20/07. (WL0153754) [FILED UNDER SEAL].
144. Minutes of Consumer Electronics Association, 2/21/07. (DP 01410) [FILED UNDER SEAL].
145. Email from T. Collings to D. Perri & M. Eldon of 4/2/07. (WL0149518) [FILED UNDER SEAL].
146. Email from T. Collings to D. Perri & M. Eldon of 3/21/07. (WL0149731) [FILED UNDER SEAL].
147. Email from M. Eldon to T. Collings & D. Perri of 4/2/07. (WL0145398) [FILED UNDER SEAL].
148. Email from T. Collings to M. Eldon & D. Perri of 4/2/07. (WL0149525) [FILED UNDER SEAL].
149. CEA Procedures, *Technology & Standards Procedures Manual*, CEA-EP-23, September 2006.

150. CEA, Legal Guides, Part II: Special Guides Applicable to Standardization Programs, Section C. Basic Rules for Conducting Programs.)
151. Draft Agreement between Tri-Vision and Hitachi of 3/5/02. (WL0002576) [FILED UNDER SEAL].
152. Exhibits 8 to M. Riley Opening Ex. Rpt. of 1/14/11. [FILED UNDER SEAL].
153. T. Collings Comments to the FCC of 4/7/03. (WL0187869) [FILED UNDER SEAL].
154. Letter from T. Collings to N. Siddiqui of 11/27/98. (WL0259925) [FILED UNDER SEAL].
155. Email from N. Siddiqui to M. Eldon of 5/8/07. (WL0423918) [FILED UNDER SEAL].
156. Email from A. Waxler to M. Fortkort of 3/7/07. (WL0145323) [FILED UNDER SEAL].
157. Letter from N. Feivelson to M. Fortkort of 10/2/07. (WL0092668) [FILED UNDER SEAL].
158. Email from P. Chua to Forktkort of 8/14/07. (WL0123605) [FILED UNDER SEAL].
159. Amendment No.2 to ATSC Standard: Program And System Information Protocol For Terrestrial Broadcast And Cable, Doc.A/65A. (ATSC158390)
160. Email from T. Collings to D. Perri, et al of 1/12/10. (WL0279639 ) [FILED UNDER SEAL].
161. Article entitled “Technology Transfer Stories: 25 Innovations that Changed the World.” (WL0075935)
162. Email from T. Collings to M. Eldon of 7/7/07. (WL0327398) [FILED UNDER SEAL].
163. Wi-LAN US Patent ‘402 Licensing Strategy. (WL0319037) [FILED UNDER SEAL].
164. Email from T. Collings to N. Siddiqui of 12/10/06. (WL0423983) [FILED UNDER SEAL].
165. Letter from R. Parr to A. Kang of 1/4/01. (WL0003018) [FILED UNDER SEAL].

166. Letter from R. Parr to Chueng of 5/24/01. (WL0263325) [FILED UNDER SEAL].
167. Email from Collings to Roberts, et al of 1/9/08. (WL0425147) [FILED UNDER SEAL].
168. Excerpts of J. Roberts Dep., dated 11/30/10 [FILED UNDER SEAL]
169. Michley Electronics License Agreement of 8/23/07. (WL0259119) [FILED UNDER SEAL].
170. Diboss License Agreement of 8/31/07. (WL0258513) [FILED UNDER SEAL].
171. Hyundai IT License Agreement of 9/19/07. (WL0258916) [FILED UNDER SEAL].
172. 11/16/10 Defendants' Letter to Judge Peck. [FILED UNDER SEAL].
173. Hearing Tr., 10/29/10.
174. Letter from N. Siddiqui to S. Kang of 11/3/2004. (LG048782) [FILED UNDER SEAL].
175. Letter from J. Parr to J. Lee of 7/29/05. (WL0263711) [FILED UNDER SEAL].
176. Letter from S. Kang to N. Siddiqui of 1/31/05. (WL0111235) [FILED UNDER SEAL].
177. Letter from N. Siddiqui to A. Kang of 1/2/06. (WL0014484) [FILED UNDER SEAL].
178. Email from N. Siddiqui to A. Kang of 1/17/06. (WL0089121) [FILED UNDER SEAL].
179. LG Letter of Intent, 2/28/06. (WL0111219) [FILED UNDER SEAL].
180. Email from N. Siddiqui to A. Kang of 3/3/06. (WL0088609) [FILED UNDER SEAL].
181. Email from J. Roberts to N. Siddiqui of 3/8/06. (WL0350601) [FILED UNDER SEAL].
182. Email from T. Collings to N. Siddiqui of 11/2/06. (WL0368185) [FILED UNDER SEAL].
183. Email from N. Siddiqui to A. Kang of 3/9/06. (WL0200715) [FILED UNDER SEAL].

184. Email from N. Siddiqui to A. Kang of 3/21/06. (LG073238) [FILED UNDER SEAL].
185. Handwritten Attorney Notes of 3/21/06. (WL0426961) [FILED UNDER SEAL].
186. Handwritten Attorney Notes of 3/21/06. (WL0426964) [FILED UNDER SEAL].
187. Email from N. Siddiqui to A. Kang of 3/21/06. (WL0115294) [FILED UNDER SEAL].
188. Excerpts of W. Middleton 30(b)(6) Dep., dated 11/24/10 [FILED UNDER SEAL]
189. Email from N. Siddiqui to M. Eldon of 3/30/06. (WL0316285) [FILED UNDER SEAL].
190. Email from T. Collings to N. Siddiqui of 2/11/07. (WL0327951) [FILED UNDER SEAL].
191. Email from T. Collings to M. Eldon of 4/30/06. (WL0377478) [FILED UNDER SEAL].
192. Email from A. Kang to N. Siddiqui of 5/2/06. (WL0007548) [FILED UNDER SEAL].
193. Pltf. Resp. to LG's First Set of Requests for Admissions. [FILED UNDER SEAL].
194. '402 Patent License Agreement Between Tri-Vision and LG of 5/17/06. (WL0259055) [FILED UNDER SEAL].
195. LG Royalty Calculation Form of 7/3/06. (WL0223813) [FILED UNDER SEAL].
196. Email from A. Kang to J. Roberts of 10/31/06. (WL0199058) [FILED UNDER SEAL].
197. Email from A. Kang to J. Roberts of 11/1/06. (WL0196371) [FILED UNDER SEAL].
198. Excerpts of W. Middleton Dep., dated 11/23/10 [FILED UNDER SEAL].
199. Email from F. Cheng to N. Siddiqui of 7/12/06. (WL0007245) [FILED UNDER SEAL].

200. ‘402 Patent License Agreement Between Tri-Vision and Sichuan Changhong Electric Co., Ltd. of 3/31/06. (WL0259683) [FILED UNDER SEAL].
201. ‘402 Patent License Agreement Between Wi-LAN and Forworld Electronics Co., Ltd. of 6/21/10. (WL0382934) [FILED UNDER SEAL].
202. Email from J. Roberts to T. Collings and N. Siddiqui of 5/1/09. (WL0382211) [FILED UNDER SEAL].
203. Email from M. Eldon to Runco of 6/19/2006. (WL0048132). [FILED UNDER SEAL].
204. Email from N. Siddiqui to M. Jeon of 7/4/06. (WL0087129) [FILED UNDER SEAL].
205. Email from M. Eldon to D. Fligor of 6/16/06. (WL0046443) [FILED UNDER SEAL].
206. Email from N. Siddiqui to B. Randhawa, B. Daley, M. Fortkort, and R. Parr of 11/4/01. (WL0309558) [FILED UNDER SEAL].
207. Wi-LAN Document re: Licensing Strategy of 4/4/07. (WL0377101) [FILED UNDER SEAL].
208. Wi-LAN Document re: Current Licensing Strategy. (WL0332418) [FILED UNDER SEAL].
209. ‘402 Patent License Agreement Between Tri-Vision and Funai Electric Co., Ltd. of 1/14/03. (WL0221588) [FILED UNDER SEAL].
210. Email from J. Roberts to T. Collings and M. Eldon of 11/13/07. (WL0416404) [FILED UNDER SEAL].
211. Email from T. Collings to M. Eldon of 12/18/06. (WL0328230) [FILED UNDER SEAL].
212. Email from M. Eldon to T. Collings of 12/18/06. (WL0325864) [FILED UNDER SEAL].
213. Email from T. Collings to M. Eldon of 12/18/06. (WL0328233) [FILED UNDER SEAL].
214. Email from T. Collings to T. Ikebe of 10/28/08. (WL0333937) [FILED UNDER SEAL].
215. Email from T. Collings to J. Skippen of 7/9/08. (WL0429948) [FILED UNDER SEAL].

- 216. Email from T. Ikebe to T. Collings of 10/19/08. (WL0333992) [FILED UNDER SEAL].
- 217. Email from J. Roberts to T. Collings and M. Eldon of 4/30/09. (WL0382663) [FILED UNDER SEAL.]
- 218. Email from J. Skippen to T. Collings, M. Fortkort, N. Siddiqui, T. Ikebe of 7/16/08. (WL0333442) [FILED UNDER SEAL].
- 219. Email from T. Collings to M. Fortkort and N. Siddiqui of 4/3/08. (WL0356553) [FILED UNDER SEAL].
- 220. Email from T. Collings to M. Eldon of 11/27/06. (WL0328343) [FILED UNDER SEAL].
- 221. W-LAN V-Chip Licensing Q1-10 Mid Quarter Report of 2/12/10. (WL0332933) [FILED UNDER SEAL].
- 222. Letter from Congressman E. Markey to FCC Commissioner M. Powell of 1/29/03. (WL0147575)
- 223. Parents Hopes & Concerns About the Impact of Media, USCCB, March 2010. (WL0267694)
- 224. H. Osman's Comments to the Conference of Catholic Bishops of 2/24/10. (WL0296931)
- 225. Joint Letter to Judge Peck of 03/04/11.

I declare under penalty of perjury under the laws of the United States that the foregoing information is true and correct to the best of my knowledge, information and belief.

Dated: April 2, 2011

/s/ Richard D. Harris

Richard D. Harris